

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY  
AVERAGE WHOLESALE PRICE  
LITIGATION

MDL NO. 1456

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

**MOTION FOR ADMISSION *PRO HAC VICE*  
OF JEREMIAH FREI-PEARSON**

Pursuant to Local Rule 83.5.3(b), Karen F. Green, a partner at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, a member of the bar of this Court, and an attorney of record for Novartis Pharmaceuticals Corporation (“Novartis”), hereby moves for the admission *pro hac vice* of Jeremiah Frei-Pearson as counsel for Novartis in this action.

In support of this motion, Mr. Frei-Pearson has certified that (1) he is a member of the bar in good standing in every jurisdiction where she has been admitted to practice; (2) there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction; and (3) he is familiar with the Local Rules of the United States District Court for the District of Massachusetts. Mr. Frei-Pearson’s certification is attached as Exhibit A to this motion.

Respectfully submitted,

/s/ Karen F. Green

Karen F. Green (BBO #209050)

Benjamin M. Stern (BBO #646778)

Wilmer Cutler Pickering Hale and Dorr LLP

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Dated: February 15, 2004

**CERTIFICATE OF SERVICE**

I, Benjamin M. Stern, certify that, on this February 15, 2005, a copy of the foregoing document has been served on counsel of record by electronic means pursuant to the Court's Case Management Order dated July 23, 2002.

/s/ Benjamin M. Stern  
Benjamin M. Stern